



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 13, 2014

Ms. Karen Wood
Department of Ecology
Air Quality Program
Eastern Regional Office
4601 N. Monroe Street
Spokane, WA 99205-1295

Re: Second Tier Petition by Terex Company

Dear Ms. Wood:

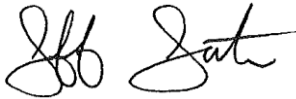
The Washington State Department of Ecology's Air Quality Program (Ecology) has completed its review of health risks from manganese emissions from a proposed project by the Terex Company in Moses Lake, Washington. The proposed project consists of adding two new powder coating operations and a burn-off oven at the Moses Lake facility. The new equipment will enable an increase in production of work platforms, which will result in increased welding activity at the facility.

Ecology's review of the different manganese health risk-based reference concentrations published by USEPA, ATSDR and the California OEHHA revealed the most technically defensible ones are those from OEHHA. Terex's consultant, ENVIRON, used OEHHA's reference concentrations to estimate noncancer hazards of Terex's manganese emissions. The resulting hazard quotients for residential areas near Terex were less than one, meaning adverse health effects attributable to Terex emissions are unlikely among people living nearby. Ecology estimate hazard quotients for commercial receptors near Terex. The results indicate adverse health effects attributable to Terex emissions are unlikely among people working nearby. Ecology's review also indicates that Toxic Air Pollutant emissions from the proposed project will not increase risk of cancer among people at residential or commercial properties neighboring Terex.

Parties to this project have satisfied four of the five requirements under Chapter 173-460-090 necessary for Ecology to review the Second Tier petition. Based on the review of Terex's second tier petition, Ecology recommends approval of the proposed project because its health risks are permissible under WAC 173-460-090. The recommendation to approve the project is contingent on an ultimate Permit condition that manganese emissions be limited to rates no greater than those ENVIRON applied when they modeled concentration impacts.

If you would like to discuss this project further, please contact Matt Kadlec at 360-407-6817 or matt.kadlec@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Johnston", with a stylized, cursive script.

Jeff Johnston, Ph.D.
Science and Engineering Section Manager
Air Quality Program

jj/te

Enclosure

cc: Ranil Dhammapala, Ecology
 Beth Davis, Thompson Hine
 Alma Feldpausch, Environ
 Gregory Flibbert, Ecology
 Kathryn Hall, Genie Industries
 Eric Hansen, Environ
 Jeff Johnston, Ecology
 Matt Kadlec, Ecology
 Robert Koster, Ecology
 Michael Schultz, Environ
 Dean Wisler, Terex